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11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 LINDA ELAINE STITES-MOUNTS,
14 Plaintiff,
15
16 v.
17 KILOLO KIJAKAZI,
Acting Commissioner of Social Security,
18 Defendant.

No. 1:22-cv-00630-SKO

STIPULATED MOTION AND ORDER FOR
AN EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S MOTION FOR SUMMARY
JUDGMENT

(Doc. 14)

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21 IT IS HEREBY STIPULATED, by and between the parties through their respective
22 counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's
23 Motion for Summary Judgment be extended days forty-five days (45) days from January 19, 2023
24 to March 5, 2023. This is Defendant's first request for an extension. Plaintiff has no objection to
25 Defendant's request for an extension.

26 Good cause exists for this request. Defendant respectfully requests this additional time
27 because Counsel for Defendant has been unable to devote the time required to complete
28 Defendant's response to Plaintiff's Motion for Summary Judgment given the current due date.

Stipulated Motion for Extension of Time; Order

Counsel has been out of the office since December 23, 2022 on vacation visiting family and was to return home on January 4, 2023. Due to the storm hitting San Francisco and ensuing flight cancellations, Counsel did not return home until January 6, 2023. Counsel now needs to take unexpected leave because his grandmother is under hospice care and expected to pass in the coming days. Given this situation and competing workload requirements an extension until March 5, 2023 should provide an opportunity for the undersigned Counsel for Defendant to complete the response to Plaintiff's Motion for Summary Judgment. Furthermore, a reassignment of this matter to another staff attorney is currently not tenable given the high volume of cases that all of our limited staff (due to leave and resignations) is handling. Counsel apologizes to the Court for any inconvenience caused by this delay. All other dates in the Court's Scheduling Order shall be extended accordingly.

Respectfully submitted,

PHILLIP A. TALBERT
United States Attorney

DATE: January 13, 2023

By: s/ Oscar Gonzalez de Llano
OSCAR GONZALEZ DE LLANO
Special Assistant United States Attorney
Attorneys for Defendant

Respectfully submitted,

Attorneys for Plaintiff

DATE: January 13, 2023

By: s/ William M. Kuntz *
William M. Kuntz
Law Offices of William M. Kuntz
(*as authorized by email)

ORDER

Pursuant to the parties' foregoing stipulated motion (Doc. 14), and for good cause shown,
IT IS ORDERED that Defendant shall have an extension, up to and including March 5,
2023, to file Defendant's Motion for Summary Judgment. All remaining deadlines in the
Scheduling Order (Doc. 3) are extended accordingly.

IT IS SO ORDERED.

Dated: **January 17, 2023**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE